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respectfully traversed, as the Bach patent fails to teach or suggest the combination of features set forth in Applicants' claim 20.

Exemplary embodiments of the present invention are directed to a carrier system for providing positive control over a printable medium processed by a printing system, to prevent damage to the printable medium. The exemplary Figure 1 embodiment illustrates a carrier system 100 associated with a printable medium 104. A carrier system 100 includes a first roller chain carrier assembly 120 for contacting the printable medium from one side, and a second roller chain carrier assembly 122 for contacting the printable medium from an opposite side. The first and second roller chain carrier assemblies work in synchronism to positively control a transport of the medium 104 from an area of constraint upstream of a cutting cylinder pair 102, through the cutting cylinder pair. The first and second roller chain carrier assemblies maintain positive control over signatures as they are transported to a downstream area of constraint.

The first roller chain carrier assembly includes a first looped drive chain 124 and a second looped drive chain 130. The second roller chain carrier assembly 122 also includes a first looped drive chain ¹³⁶~~138~~ and a second looped drive chain 142. The first and second roller chain carrier assemblies 120 and 122 contact the medium via cross bars associated with each of the first and second roller chain carrier assemblies. For example, the first roller chain carrier assembly includes gripper cross bars 152 through 164, while the second roller chain carrier assembly 122 includes roller cross bars 166 through 174. Each gripper cross bar includes a plurality of grippers 176 mounted on a support bar 178. Roller cross bars, such as roller cross bar 166, each include a roller 180 supported on a support bar

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can be performed by releasing flat articles from clips 11 on one belt 12 to a respective one of the plural tool units 23 carried by the belt 20.

However, the Bach patent fails to teach or suggest any use of a rotatably mounted gripper cross bar or a rotatably mounted roller cross bar as recited in Applicants' claim 20 combination. There is no teaching or suggestion in the Bach patent of providing plural parallel clips 11 (i.e., parallel in a direction into the plane of Fig. 1), and as such, there would not have been any motivation to provide rotatably mounted gripper or roller cross bars as presently claimed. Figure 1 of the Bach patent does not show a top view of the clips 11, and the specification makes no mention that any parallel arrangement of clips 11 mounted on a rotatable gripper cross bar is provided in the Figure 1 arrangement. Figure 2 of the Bach patent shows a bottom view of the tool units 23 arranged in series, and illustrates that there is no parallel arrangement of tool clips on any rotatably mounted roller cross bar in a direction into the plane of Figure 1. As such, this patent teaches away from use of rotatably mounted gripper and/or roller cross bars.

A more detailed illustration of the Figure 1 tool units 23 of the Bach patent is illustrated in Figure 2 wherein it can be seen that a cam follower 36 is rotatably mounted on the shaft 37. However, there is no description that shaft 37 itself rotates (see discussion of the operation of shaft 37 at column 3, lines 35-40). As such, shaft 37 cannot be considered a rotatably mounted roller cross bar as recited in claim 20.

In addition, while it is noted that the clips 11 include some ability to rotate at least a portion thereof about a shaft to create closed and opened positions, there is no teaching or

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suggestion that any rotatable crossbar is associated with each clip 11. As such, there is no teaching or suggestion of a rotatably mounted cross bar as recited in claim 20.

In light of the foregoing comments, it is respectfully requested that claim 20 is allowable over the Bach patent whether this document is considered alone, or in combination with the unsubstantiated assertion of "official notice" taken by the Examiner in the Office Action. Claim 20 is therefore considered allowable. The remaining claims 21-23 and 27 depend from claim 20 and recite additional advantageous features which further distinguish. Similarly, non-elected claims 24-26 depend from claim 20 and recite additional advantageous features which are also considered allowable. As such, an indication of allowance of all of claims 20-27 is respectfully requested.

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance and such allowance is respectfully solicited.

Respectfully submitted,

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Date: December 30, 2002